

POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

Retail Access Optimization Initiative

Docket No. N2011-1

**Responses of National League of Postmasters
Witness Hobbs to USPS/NLPM RT2, 1-23
(October 6, 2011)**

The National league of Postmasters hereby provides the responses of its Witness Mayor Donald Hobbs to the Postal Services Interrogatories USPS/NLPM-RT2-1-23. The interrogatories are restated verbatim, with the response following each interrogatory.

In the Postal Service's interrogatories, there were two different questions labeled USPS/NLPM-T2-5. We have taken the liberty of renumbering the second of the two as USPS/NLPM-T2-5a.

/s/ Robert J. Brinkman

Robert J. Brinkmann
Law Offices of Robert J. Brinkmann LLC
1730 M St. N.W. Suite 200
Washington, D.C. 20036
202-331-3037; 202.331-3029 (f)
robert.brinkmann@rjbrinkmann.com

/s/ Harold Hughes

Harold Hughes
Michelle Bushman
Ford & Huff LC
10542 South Jordan Gateway, Suite 300
South Jordan, Utah 84095
801-407-8555
hal.hughes@fordhuff.com
*Counsel for the National League of
Postmasters of the United States*

USPS/NLPM-RT2-1

- (a) In addition to yourself, please identify all corporations, partnerships, businesses, commercial entities, governmental and non-profit entities, other organizations and individuals who serve as sources of funding, governance or direction for lowans for Post Office Services.
- (b) Please indicate which entities or individuals identified in response to subpart (a) own or control properties that currently are leased to the United States Postal Service in Iowa. For each, indicate the number of such properties, and the city and street address for each.

Response

- (a) The following cites and groups from Iowa make up our membership:

Alexander Iowa	Lohrville Iowa
Andrew Iowa	Long Grove Iowa
Arlington Iowa	LuVerne Iowa
Badger Iowa	Mallard Iowa
Bondurant Iowa	McCallsburg Iowa
Britt Iowa	Mid-Iowa Development Association
Calhoun County Economic Development Corporation	Mingo Iowa
Center Junction Iowa	Modale Iowa
Conroy Iowa	New Hartford Iowa
Crystal Lake Iowa	Onslow Iowa
Cushing Iowa	Orchard Iowa
Eldora Iowa	Pilot Mound Iowa
Everly Iowa	Prairie City Iowa
Farnhamville Iowa	Promise City Iowa
Ferguson Iowa	Randolph Iowa
Fort Dodge Iowa	Reasnor Iowa

Friends of Swaledale Iowa	Rhodes Iowa
Grafton Iowa	Seymour Iowa
Hamilton County Support for Enriching Economic Development	Springville Iowa
Hanlontown Iowa	St.Olaf Iowa
Harris Iowa	Stratford Iowa
Hills Iowa	Swaledale Iowa
Iowa League of Cities	Vining Iowa
Kamrar Iowa	Whitten Iowa
Ladora Iowa	Woodburn Iowa
Lake City Iowa	Woolstock Iowa
Lamoni Iowa	
Lewis Iowa	

See also our website. <http://www.midascog.net/publications/post-office-closures>

I am the Director of the group and there are no other specific people or entities that contribute funding, governance, or direction for the group. Like any volunteer group, we just discuss among ourselves what we need to do and how we are going to do it. As most of the individuals are mayors, we are elected government officials, and as such representatives and leaders of our communities. When we speak, we speak for our communities. When I speak, I speak for the group and thus for the communities.

The group has no real funding and no real budget. Some people have given us stamps to use for mailings, and the Mid-Iowa Development Association (MIDAS) Council of Governments gave us a page on their website. They did so because they understand the critical importance of small rural post offices to a successful rural economy and successful rural development.

The MIDAS Council of governments is an intergovernmental agency that was created in response to common interests of governments and the need for cooperative approaches to solve area-wide issues. This cooperative venture is intended to help local governments improve their capacity to implement services by defining regional issues, problems, and opportunities; setting priorities and formulating policies, plans and programs to deal with them; and achieving efficient and effective action on area wide matters (such as closing

small rural post offices) through communications, coordination, and cooperation.

When I agreed to testify for the National League of Postmasters, the League said they would take care of the hotel expense for me to if our group could take care of the air fare. I agreed. When the Association of United States Postal Lessors heard I was doing this, they volunteered to pick up my airfare. I happily accepted. A few member communities have also contributed toward other costs involved with traveling to DC. Other than that, our group has not had had any financial contributions.

(b) I do not know, although I think that the City of Mingo and the City of McCallsburg bought the property their post offices are on so they could keep them open.

USPS/NLPM-RT2-2

Please refer to page 1, line 22 of your testimony. Please describe in detail all activities and provide copies of all documents directed by IPOS to elected and appointed United States government officials since January 2010 related to efforts by IPOS to "help save" the United States Postal Service.

Response

There are three letters, described below, attached as attachment B.

- July 29, 2011 Joint Letter from the Iowans for Post Office Services and Governor Terry Branstad to Postmaster General Donahoe.
- July 16, 2011 Letter to Chair Goldway and the Members of the Postal Regulatory Commission.
- August 29, 2011 Letter to Senator Tom Harkin, with a cc to Senator Chuck Grassley, all Iowa Congressman, PMG Donahoe, and PRC Chair Goldway.

For the July 29 letter, since the Postmaster General seemed to be ignoring the protests of the towns that were losing post offices, Governor Branstad joined us on that letter to try to get a bit more of the Postmaster General's attention. It obviously did not work. Both the letter to Postmaster General Donahoe and the letter to the Iowa Congressional delegation had the same goal of asking for a moratorium on closing Post Offices while a commission could be formed to find solutions to the USPS financial problems.

USPS/NLPM-RT2-3

Please provide all documents related to all surveys and research underlying the proclamation attributed to "[m]any citizens and business owners" at page 4, lines 21-22 of your testimony.

Response

I have no need to conduct any surveys or undertake any research on our citizens for this testimony. Doing something like that with any of our city funds would have been the height of irresponsibility since such surveys or research would have told us nothing that we would not have already known from our conversations with our constituents.

Unlike big cities, we do not need to conduct research to find out what our people think. We just ask them. I have communicated directly to most of Lohrville's 368 citizens, as have my fellow mayors with their constituents. The sentiment I described in my testimony was commonly felt.

It does seem that the Postal Service appears to be not concerned with the prospect of losing the business and (even more importantly) the good will of rural America. Rather, it seems to be trying—rather unsuccessfully I might add—to undercut my testimony by implying that the results that I obtain by speaking directly to the citizens of my community is somehow inferior to academic research and survey work. Such a bias reflects the mentality of an institution that has lost touch with its constituents and has no idea what the concept of "binding the country together" or the notion of community actually means in the real world.

USPS/NLPM-RT2-4

Please indicate whether, to your knowledge, the owner of the business described at page 4, lines 22-23 of your testimony creates, records, and/or files any bills, statements, bids or bill payments referenced at pages 4-5 in a computer- generated format. If your response is affirmative, please describe in detail the "extra effort" that would be involved in that business sending such documents to customers by electronic means compared to the effort of sending such documents by mail.

Response

To my knowledge the owner creates bills and bids in a computer generated format. I cannot speak to any other workings of their business.

However, I believe that that business does have customers without computers and customers that have computers but no email. I imagine, but do not know for certain, that they would have customers who would not trust the electronic delivery of their bills and would not use the company's services if that is the only way they would get their bills.

Thus, the question would not necessarily be merely the extra effort involved in their ability to deliver their invoices, but rather their ability to do so, the question of the reliability and security of any alternatives, and the negative effect that using the alternatives might have on their business.

As for the actual extra effort involved to send such documents to customers by electronic means, that effort would encompass the time and money that would be involved in setting up an electronic invoice delivery system, the time and money involved in establishing security protocols, and the time and money involved in convincing their customers that such a system would be safe and secure, and the time and money involved in obtaining and maintaining addresses for customers and prospective customers. Likewise there would be time and money involved in making sure those customers and prospective customers actually received the correspondence and received it in a format that they can open on their computer.

As for bill payments, I would think the time and money issues involved would be similar, although perhaps the security efforts would be less. There might be the possibility of creating special accounts with suppliers and bank institutions, but all that involves extra time and money. Small rural companies might well not have that type of time and money available.

USPS/NLPM-RT2-5

- (a) Please confirm that the population of Lohrville decreased by more than 17 percent from the year 2000 to the year 2009. If you do not confirm, please explain.
- (b) Please list and describe all factors other than human mortality that have, to your knowledge, contributed to the change in population.
- (c) Please indicate whether and by how much the population of Calhoun County has increased or decreased since the 2000 census.
- (d) Please list and describe the factors other than human mortality and/or birth that have, that have, to your knowledge, contributed to this trend.

Response

- (a) Not confirmed. I believe it is closer to 15%. We went from 433 to 368.
- (b) To my knowledge it has been for personal reasons such as family situations changing, change of jobs, retiring to a location closer to their children, and just the general migration to urban areas that has been seen in all rural communities.
- (c) I understand that it decreased although I have no specific knowledge of this.
- (d) See my answer to (b) above. If we are considering county wide factors, one would have to take into account farmers, and the general trend of moving from the farm to the city.

USPS/NLPM-RT2-5a (originally a second question 5 in the USPS interrogatories)

(a) Please list and describe the nature of the business entities located within the city of Lohrville.

(b) Is it your opinion that there is insufficient business or governmental activity in Lohrville to attract the services of a private firm that would provide daily collection and transport of outgoing mail from Lohrville businesses and local government agencies for entry in bulk at a Post Office in or outside the city limits? If so, please provide all documents underlying any analysis performed in support of that conclusion.

Response

(a) Here is the list.

BUSINESS NAME/OWNER	Business
In town Lohrville Businesses	
AIR ELECTRIC	Decorative Windmill manufacturing
BERGER AUTO	Auto Body repair and Auto Sales
THE BBQ SHACK	Restaurant
BROWN'S FUNERAL HOME	Funeral Home
CALHOUN COUNTY SHED	County facility
CARL NELSON	Roto Rooter
CASEY'S	Gas Station
DIVERSIFIED HOMES	Pre-manufactured home sales
FARMERS CO-OP	Co-op
GK Builders	Home and business construction
Hands in Motion	Religious Non-profit Signlanguage providers
Hazard County Lounge	Lounge/bar
Iron Horse Cycle	Custom Motorcycles
KIRBY INSURANCE	Home and business Insurance
Linda M Schmitt Accounting	Accountant and Tax services
LOHRVILLE CHIROPRACTIC CLINIC	Chiropractor
LOHRVILLE LOCKER	Meat locker
MASONIC LODGE	Fraternal organization
MILLER EXCAVATING	Excavating
Mohr Excavating	Excavating
MURPHY MANAGEMENT	Property Management
NEW COOPERATIVE	Co-op
PIONEER SEED	Farm Seed sales
POST OFFICE	Binding the nation together
PUGS PUB	Pub
SOUTHERN CAL SCHOOLS	School

ST. JOSEPH'S CHURCH	Church
Sunshine Painting	Interior and Exterior painting
TOWN AND COUNTRY INSURANCE	Home and business Insurance
UNITED BANK OF IOWA	Bank
UNITED METHODIST CHURCH	Church
WHITEY'S GARAGE	Auto Mechanic

Rural Lohrville Businesses

Auto Interior and Upholstery	Specialists in Molded Automotive Interiors and Seat Covers
Gemberling Excavating	Excavating
Gentry Electric	Electrical contractor
Jim Hirsberg's Sound Co	DJ company
Sarah's Salon	Hair Salon
Schamel Construction	Home remodeling, repair and carpentry
The Second Amendment Shop	Gun Shop

(b) Yes that would be my opinion. I think it is a matter of common sense. Not only that, I think that is why the Postal Service was created, is maintained, and remains relevant and why I am doing everything I can to keep my Post Office open.

USPS/NLPM-RT2-6

Please refer to your testimony at page 8, line 9 and quantify the term "short."

Response

Less than a mile. Lohrville is only a mile wide.

USPS/NLPM-RT2-7

Please refer to your testimony at page 9, lines 5-6. Please indicate the approximate distances and normal driving times from Lohrville to:

- (a) the Post Office in Lake City to the west; and
- (b) the Post Office in Farnhamville to the east.
- (c) Please confirm that the approximate driving distance from your place of employment to its nearest postal retail location is approximately 0.2 miles.
- (d) How does the distance referenced in subpart (c) compare to the driving distance between your residence and its nearest postal retail location?

Response

- (a) 9.7 miles, 28 minutes round trip under normal driving conditions.
- (b) 8.2 miles, 28 minutes round trip under normal driving conditions.
- (c) Confirmed.
- (d) It is about the same distance.

USPS/NLP-RT2-8

Please refer to your testimony at page 8, line 14. In your opinion, do the residents of Lohrville currently value their elderly neighbors sufficiently to volunteer to conduct postal transactions for them or make trips to the Post Office for them during periods of high heat, snow or ice?

Response

Yes.

USPS/NLPM-RT2-9

Please refer to your testimony at page 8, line 14. In your opinion, would the residents of Lohrville value their elderly neighbors sufficiently to volunteer to conduct postal transactions for them or make trips to the Post Office for them during periods of high heat, snow or ice, if the nearest available Post Office were in Lake City or Farnhamville?

Response

The distance makes a big difference.

First, while many of our residents do value their elderly neighbors sufficiently to make trips for them to the Post office and conduct postal transactions, since many of the residents have work and other commitments, it would be asking a whole lot to ask them to volunteer to make a 30 mile round trip on a regular basis. One can only expect so much of a volunteer.

Second, in winter this is not always an option. Driving 30 miles across country on small country roads is not like driving in a city or suburb. At times we have significant blowing snow and some of these volunteers are retired and should not be driving in certain winter conditions. Indeed, it could be days before these individuals could go to a neighboring town. I do not believe they should be expected to do this when we have a Postal Service that brings it to town now. Again, this is a good example why the Postal Service was created, is maintained, and remains relevant and why I am doing everything I can to keep my Post Office open.

USPS/NLPM-RT-10

Please refer to your testimony at page 9, lines 6-8. Please identify all Post Offices that, to your knowledge, are "handling the business of several [others] that had been closed down" Please also indicate, if you can, whether any such closures were in the last three, five or ten years.

Response.

I do not know. But I do know that if the Lohrville Post Office were closed down and everything had to go to Lake City, the lines at Lake City would be a lot longer. Also, if Lanesboro were closed, I believe most people would then go to Lake City, which would make the lines even longer.

USPS/NLPM-RT2-11

Please refer to your testimony at page 9, lines 19-21. Please explain the basis for your understanding that the closing of a Post Office in a community means that outgoing mail from that community will never get cancelled on the same day it is deposited in the mailstream even if:

- (a) it is deposited in a blue collection box before the last scheduled pick-up time;
- (b) it is left in a residential mail receptacle for pick-up that day by a rural or city carrier before the carrier makes delivery.

Response.

Any pickup that occurs in Lohrville other than that at the Post Office is done by our rural carrier when he comes through, generally around noon. The Post Office closes at 4:30. We have a blue box that we have been told will be removed if the Post Office closes.

Thus all mail will have to be picked up by the carrier at noon or it will wait until the next day. Whether the mail picked up by the carrier before noon will be canceled the same day or not is not my concern. My concern is the mail that is ready after noontime and before 4:30. Today that mail is deposited at the post office before 4:30.

Today it is canceled that same day. Indeed a business or citizen that really wants to be assured that it is canceled that day has a right to get it hand-canceled right in front of their eyes, or so Mark Strong has told me. I know in practice that that happens.

This service will disappear if our post office disappears and that is critically important for some people, some times to have that service.

I believe that, because of the importance of this service, the Postal Service has requirements (which Mark Strong told me still exists) that each post office must immediately hand cancel a letter if the customer requests it, and why each post office is supposed to have a special slot labeled "Local Postmark" and that the mail dropped in there is supposed to be hand canceled in that post office, that day.

To suggest that some letters might be canceled the same day, sometimes, at a distant facility is no substitute for asking that it be canceled in front of you, in real time.

USPS/NLPM-RT2-12

Please refer to page 10, lines 9-11. Is it your understanding that persons who have cars and are under pressure to economize their transportation expenses commonly do so by performing multiple tasks on a single driving trip: for instance, driving from home (or work) to the Post Office, and also to a nearby pharmacy, neighbor's residence, grocery store, and/or other retailer before returning home? If that is not your understanding, please explain.

Response

That is my understanding. They do this so that such trips occur only weekly, or even less frequently, such as once a month. Thus, they tend to go to grocery stores, pharmacies, and other retail establishments rather infrequently. They go the post office more frequently than that. In the documentation for the study to close the Lohrville Post Office it is stated that in 2 weeks time the following mail was dispatched: 91 first class flats, 2045 first class letters, 63 Priority, 14 Standard and some "other" that I didn't get the number written down. It also stated that there were 7 certified or insured items mailed and 114 money orders and priority parcels (subtract the 63 priority parcels previously stated and that leaves 51 money orders). When divided that is one piece or transaction for over half of the population (including children) in our town per day.

USPS/NLPM-RT2-13

Please quantify your understanding of the degree to which residents of Calhoun County are employed outside of their residences and either drive an automobile solo or participate in a car pool to get to work.

Response

I have no specific knowledge of all residents of Calhoun County. I know of only few that carpool. I would guess that 80% of the people in the country have jobs outside their house and drive to work.

USPS/NLPM-RT2-14

Please refer to page 11, lines 17-21. Is it your understanding that persons with low-to-moderate incomes who value their time commonly perform multiple tasks on a single driving trip: for instance, going from home (or work) to the Post Office, and also to a nearby pharmacy, neighbor's residence, grocery store, and/or other retailer before returning home? If that is not your understanding, please explain.

Response

See my response to 12. Low to middle income persons would typically make such trips less than others since they frequent retail establishments less than others and have less gas money. Moreover, these trips would typically be conducted in an evening or weekend when the Post Office is likely to be closed and money orders unavailable.

USPS/NLPM-RT2-15

Please refer to your testimony at page 12, lines 6-8. Please state the basis for your assertion that a rural Post Office has historically been in every community across America. In doing so, indicate whether you currently believe there to be a Post Office in every community or municipality in Calhoun County?

Response

The USPS would have the documentation for how many towns had post offices. It is my understanding that all communities did have a Post Office. Thinking of every community in our area, either existing or extant, they all had a Post Office at one time. Thus historically (which is what I said) the standard has been a post office in every municipality.

With a country the size of the United States, I am sure that there are exceptions.

Today, there is not a Post office in every community or municipality in Calhoun County. Some have been closed as the towns have disappeared (which is to be expected) or become extremely small with no businesses. A number of offices today are in process of being closed, and my understanding is that the Post Office may close all rural post offices in the country within the next five or six years. Such a move would devastate rural America.

USPS/NLPM-RT2-16

Please indicate your understanding of the degree to which the incorporation of Lohrville as a municipality and its recognition by Calhoun County and the State of Iowa as such is contingent upon the presence of a Post Office within its city limits or the assignment of a 5-digit ZIP Code to the city.

Response

Such a legal contingency does not exist.

USPS/NLPM-RT2-17

- (a) Aside from the existence of a Post Office, what other factors in your view contribute to a community's identity and image among its residents? Please discuss and rank the non-postal factors in relative order of importance.
- (b) Aside from the existence of a Post Office, what other factors in your view contribute to the image of a community by persons who are not residents? Please discuss and rank these non-postal factors in relative order of importance.
- (c) Please identify and provide references to (including electronic links) or, in the alternative, copies of to all sociological studies, economic analyses, public surveys, and other data sources you consulted in preparing your testimony.

Response

(a) The citizens and community members themselves, and their actions and attitudes are the most significant contribution to the existence of a community identity amongst our residents. They are, after all, the community, its identity. These people create the activities that celebrate and remind them of the various aspects of the community, and they participate in the community life as they go about their normal, regular activities. Some of these activities happen because of the normal activities of the community—work, school, church, recreation—and some happen because of the history of the community and the heritage of the people. Local businesses are a key to the notion of a community identity because most of these people and activities could not survive without the support and supplies that our businesses provide. The identity of the community is evident by what the community looks like, the buildings, the yards, and the visual look of the town.

Our community members normal activities make up much of the identity of the community. But how they work together to create and improve the image of our community as they go through their lives, participating in their everyday activities, highlights and defines the nature of our community. Our people work for what they believe in and help each other when they need it. This is what creates the image of our town.

My image of our town is one of caring folks that look after one another. When we had our first children the entire town held a baby shower, they were there to help us when we needed them. Right now, a smaller neighboring town is doing this very thing for a farmer. This type of thing is common. Also, the spirit and identity of our community comes into play when emergencies occur. The farmer I mentioned above recently had some heart problems requiring surgery and is unable to harvest his crop. Multiple community members are in his fields this week harvesting and hauling his crop to the co-op. This is the priceless nature of being a community. Everyone works together to keep our community image, no matter what their history with each other is or what their political or religious views are, regardless of whether they like or dislike each other, or agree or disagree with each other. Without living in communities like ours, one does not grasp the full concept of being a community.

Our Post Office acts as a lens, or a focal point for this community identity. It helps define it, refine it, and make it clear. After all, it is OUR post office and nobody else's. Moreover, in that post office is a representative of the federal government who is here in our town to help us in our everyday lives and to help us keep connected with each other and with the world.

(b) Those who are not residents of a particular community will see the identity of that community first in one of two ways. Those that actually come into the town to do business or attend a function would see the identity of the town by the citizens and community members. Those who just drive through a town primarily see the community image by the condition and appearance of the town. If there is a business that the person driving through town feels he should patronize, that person would learn more about that community, having met citizens at that place of business.

(c) As I indicated before, it would be highly irresponsible for me to spend any of my town money contracting for research or survey work when I can just go down the street and talk to my citizens. I need not study academic literature to understand what a rural town's community identity is. I know it; I experience it every day; and I live it.

The only document at which I glanced—and did not really “consult”—is a report about British rural post offices. The Future Of The Rural Post Office Network, Final report for the Commission for Rural Communities, May 2007 <http://crc.staging.headshift.com/files/DTI-Post%20Office%20Network%20public%20consultation-report14May07.pdf>

USPS/NLPM-RT2-18

Please refer to your testimony at page 16, lines 4-5. Please provide all information that identifies any businesses in England that responded to the closure of a Post Office in their village by *actually* moving to another village just to have a Post Office within walking distance.

Response

The piece I read states that the participants would consider moving their business. The point I wanted to make is that this possibility alone is a scary one for many small towns that are working so hard on economic development, and those comments just cement in my concerns. And, I guess it just makes common sense.

If you are a small business with or one or two employees, I could see how a business might be able to send one of them over to the Post Office and back to get their daily mail if it is a 10 or 15 minute absence from work. But if it would be a much longer trip and require the use of someone's car (and the liabilities that go along with that for the business), I can easily see why a business might not want to do that.

If a business had no employees and only the owner worked the shop, then any visit to the Post Office would entail closing up the shop. I could see where a small business might be able to do that for 10 or 15 minutes but not for 30 or 45.

USPS/NLPM-RT2-19

Aside from proximity to a Post Office, please list all factors that businesses present to you as Mayor of Lohrville as being relevant and material to whether they would establish operations in Lohrville as opposed to a nearby community.

Response

I have not had the opportunity to visit with a business that is looking to establish operations in Lohrville. We have had new businesses in recent years. To my knowledge they located here because of ties to the community or knowledge of our community. There was a location that fit their needs. Some were already members of this community and wanted to work where they live.

USPS/NLPM-RT2-20

Aside from proximity to a Post Office, please list all factors that businesses present to you as Mayor of Lohrville as being relevant and material to whether they would relocate from Lohrville to a nearby community.

Response

Fortunately we have not had many businesses relocate. One business that I can think of relocated to their residence, which is located in the country near Lohrville. This was done to reduce operating expenses.

USPS/NLPM-RT2-21

Aside from proximity to a Post Office, please list all factors that municipal and county economic development corporations (or local entities with similar missions) consider important to the prospect of sustaining and attracting economic development within their borders. Please discuss and rank these non- postal factors in relative order of importance.

Response

I have not asked our economic development corporation for a list of such things. I only know what I have seen in their communications and what has been reported to me by city representatives attending meetings. Business education is important to them for sustaining development. They regularly hold training sessions on good business practices. They keep a list of all available commercial buildings within the county and market those properties as much as possible. They also publish an annual book that contains local business listings, city profiles and a list of activities held in each community. They do this as a way of supporting the identity of the cities and provide opportunity for travelers to visit locations in our county. They appreciate the fact the identity of a community is their best asset in supporting economic development.

USPS/NLPM-RT2-22

Please refer to pages 15-16 of your testimony.

(a) Is there any competition among municipalities within Calhoun County to attract businesses to locate within or near their respective boundaries?

(b) If so, aside from proximity to a Post Office, please list all factors within your knowledge that can contribute to businesses relocating between or choosing among communities within Calhoun County.

(c) Aside from proximity to a Post Office, please list all factors within your knowledge that can contribute to businesses relocating or from Calhoun County to adjoining counties.

Response

(a) Only friendly competition. As a whole we work together to support each other. This is why we have a county economic development corporation. This group supports each other and helps promote each other's community.

(b) Not applicable.

(c) The only factor I can think of is vicinity to a larger community that would have more resources and a larger workforce. Among small municipalities, not having a post office would be a deciding factor.

USPS/NLPM-RT2-23

Attached to this interrogatory is a copy of the Postal Operations Manual policy regarding bulletin boards in postal lobbies. Please describe the difference between "legal" and "mundane" public notices, as you use those terms in your testimony at page 12, lines 9-11, and describe examples of such notices posted by the city of Lohrville at the Lohrville Post Office during your tenure as Mayor.

Response.

By Legal Notices I mean notices legally required to post in locations around town, such as City Council agendas, notice of property sale by the city, etc. By mundane notices I mean notices not legally required to be posted, such as Committee meetings, Hazard Mitigation plan meetings, etc. I did not mean to suggest that the subject matter of those notices was mundane. All those are examples of official notices that the city has published.

Attachment to USPS/NLPM-RT2-23

125.361 Bulletin Boards

The following guidelines apply to the use of bulletin boards:

- a. Postmasters may install bulletin boards in public areas of Post Offices or set apart a convenient place to display official government notices, notices of public assemblies, judicial sales, official election notices issued by state or local government, and similar announcements. These display privileges must be afforded without discrimination.
- b. Bulletin boards may not display private business advertisements; placards, cards, or notices; photographs or likenesses of any member of state legislature or Congress; or political pictures, cartoons, or other designed to influence an election.
- c. Notices by members of Congress are limited to public announcements of pending competitive civil service examinations and pertinent information about application for appointment to the U.S. service academies. These notices are displayed only if current and within the district of the sponsoring representative or the state of the sponsoring senator. Such displays must conform to the specifications in this section. If a postmaster believes that a notice does not conform to these specifications, the postmaster may display the poster pending the decision of the area manager, Customer Service and Sales. Notices that include the member's picture must be returned to the member with an explanation of why they cannot be displayed. Such displays must:
 - (1) Be no larger than 9 by 12 inches.
 - (2) Contain no photograph, picture, or likeness of the member of Congress.
 - (3) Contain no signature and/or printed name of the member of Congress larger than 1/2-inch (48-point) type.
 - (4) Contain the closing date for submission of applications.
- d. If space is available, one recruiting notice (no larger than 8-1/2 by 11 inches) of each branch of the armed services may be placed on bulletin boards.

125.362 Voting Information

The following guidelines apply to voting information:

- a. Any notices posted regarding voting may not contain any partisan political messages or symbols designed to influence the outcome of an election, including, but not limited to, photographs or other likenesses of incumbents or candidates for any public office. The notices must be no larger than 8-1/2 by 11 inches. Names and addresses of federal legislators may not appear in larger than 1/4-inch (18-point) type.
- b. Such notices must be displayed in lobbies that have public bulletin boards. Each notice must remain posted only as long as it contains current information applying to customers served by the displaying postal facility and must be removed not more than 2 years from the date of receipt for posting. At locations where there is no public bulletin or there is not enough space on the board for individual display, the notices should be assembled for public inspection in a binder or on a clipboard. Nothing in this section precludes postmasters from displaying additional material on public bulletin boards as space permits, as provided in 125.361.